

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Darren L. Stout, being duly sworn, hereby depose and state the following:

INTRODUCTION AND QUALIFICATIONS

1. I am an “Investigative or Law Enforcement Officer” of the United States within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the State of Ohio to request a search warrant. I am an Agent with the Medina County Drug Task Force (MCDTF), currently assigned to the Drug Enforcement Administration (DEA) Cleveland District Office as a Task Force Officer. My experience as a MCDTF Agent includes but is not limited to: physical surveillance, analyzing toll and text detail records, analysis of financial records, interviewing witnesses, drafting and executing search warrants seeking seizure of illegal drugs and other evidence of drug violations, supervising the purchases of controlled substances by undercover officers/agents and confidential informants, and debriefing persons arrested and convicted of drug trafficking offenses about their illegal activity. Prior to my employment with MCDTF, I have been a sworn law enforcement officer since March of 2001 employed by the Weston Police Department, in WV as a Patrolman. I attended the 111th Basic Academy Class at the West Virginia State Police Academy in Institute WV and successfully completed the course of study to be certified as a law enforcement officer in the state of WV. I have earned 58 credit hours towards an Undergraduate Degree in Criminal Justice and Police Science from Mountwest Community and Technical College in Huntington WV. As a Patrolman with the Weston PD I was a certified canine handler and attended training seminars on drug identification and

detection. As a canine handler I have conducted numerous searches of residences and vehicles during drug investigations. In January of 2003, I became employed by the Lewis County, WV Sheriff's Office as a Patrol Deputy. I have attended the USDOT Commercial Vehicle Interdiction training and the DEA Criminal Interdiction course of training. These classes educated me on drug identification, search and seizure laws, concealment methods and investigative techniques relating to drug investigations. During my tenure as a patrol officer I have come into contact with habitual drug users and dealers as well as communicated with other officers to identify trends and habits of these individuals. In May of 2006, I was assigned to the Harrison Lewis Drug and Violent Crime Task Force, in WV, where I have been involved in numerous State and Federal drug investigations, including but not limited to conducting controlled buys of narcotics, surveillance, interview and interrogation of suspects, and serving numerous search warrants, which lead to criminal and civil prosecution. In February of 2011, I became employed by the Medina County Drug Task Force as an Agent and was so sworn and became an OPOTA certified Police Officer in the State of Ohio.

2. Consequently, I am an "Investigative or Law Enforcement Officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), and am empowered by law to conduct investigations and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516.

3. I am currently assigned to the Medina County Drug Task Force (MCDTF), and the Drug Enforcement Administration (DEA) as a Task Force Officer (TFO), where I have participated in investigations targeting individuals and organizations involved in drug trafficking offenses in the Northern District of Ohio and elsewhere. At all times during the investigation

described herein, I have been acting in an official capacity as an Agent with MCDTF and TFO with DEA.

4. I have used informants on many occasions to investigate individuals and drug trafficking organizations (“DTOs”). Through informant interviews, and extensive debriefings of individuals involved in narcotics trafficking, I have learned the manner and means by which individuals and organizations distribute controlled substances in Ohio and other areas of the United States.

5. I have supervised purchases of controlled substances by informants, cooperating witnesses, and undercover officers. I also have experience conducting street surveillance of individuals engaged in narcotics trafficking activities. I also have participated in the execution of numerous State of Ohio, State of West Virginia, and Federal search warrants where controlled substances, drug paraphernalia, drug trafficking records, and drug proceeds were seized. I have also been the affiant on numerous State of Ohio and State of West Virginia search warrants and several Federal Search Warrant affidavits specifically related to narcotics trafficking investigations.

6. Through training and experience, I am familiar with the appearance and street names of various controlled substances, including marijuana, heroin, cocaine, crack cocaine and methamphetamine. I also know the street values of different quantities of these controlled substances, and am familiar with the methods used by drug dealers to package and prepare controlled substances for sale.

BACKGROUND

7. Affiant is an investigator involved in a criminal investigation concerning **DIONTAE HILL**. Your Affiant has reviewed reports and evidence of, spoken with other

investigators regarding, and has been involved in the investigation relating to alleged violations of federal controlled substance laws by **DIONTAE HILL**. Your Affiant affirms that, on or about March 26, 2019, in the Northern District of Ohio, Eastern Division, **DIONTAE HILL**, did knowingly possess with intent to distribute controlled substances in violation of Title 21, United States Code, Sections 841(a)(1).

PROBABLE CAUSE

8. On March 26, 2019, Trooper Michael Trader of the Ohio State Highway Patrol observed a Mercedes sedan commit a traffic violation in his presence leaving the Cleveland Hopkins International Airport. Trooper Trader initiated an investigative traffic stop at 13890 Brook Park Road, in Cleveland, Cuyahoga County, Ohio.

9. Trooper Trader, along with troopers Skipper and McGill identified the driver of the Mercedes as Robert Kish, and the passenger as **DIONTAE HILL**.

10. Trooper McGill utilized his narcotics detection canine partner during the stop to conduct a sniff of the exterior of the Mercedes sedan, which yielded a positive alert to the presence of narcotics inside the Mercedes.

11. Pursuant to the free air sniff and alert of the presence of narcotics inside the Mercedes, Troopers then conducted a probable cause search of the vehicle. During the search Troopers located a suitcase in the trunk of the vehicle which was found to contain 5 (five) kilograms sized packages within the suitcase.

12. During an interview with Robert Kish, who was identified as the driver and owner of the vehicle, it was determined that he was a ride share service driver for the Uber corporation, and was hired by **DIONTAE HILL**, for transportation from the Cleveland Hopkins Airport.

13. During the Interview, Robert Kish indicated that **DIONTAE HILL** exited the Cleveland Hopkins Airport with two bags and approached his vehicle. Kish then placed the larger, roller suitcase in the trunk of his Mercedes sedan and **DIONTAE HILL** got into the back seat with the second bag.

14. The substance contained in the five kilogram sized packages were presumptively tested for the presence of narcotics by a DEA Special Agent and Task Force Officer. Based on the test, it yielded a positive result for the presence of cocaine.

15. DEA Special Agents and Task Force Officers conducted a custodial interview with **DIONTAE HILL** who denied ownership of the five kilograms of suspected cocaine and the suitcase, in which it was located.

CONCLUSION

16. Based on the aforementioned facts and information, Affiant has probable cause to believe that **DIONTAE HILL** knowingly and intentionally possessed with intent to distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).



Darren L. Stout
Agent/TFO
Medina County Drug Task Force/Cleveland
DEA-DO

Sworn to via telephone after
submission by reliable electronic
means. Crim.Rules. 4.1; 41(d)(3)



Thomas M. Parker
United States Magistrate Judge
4:21 PM, Mar 27, 2019